# Gloucestershire Heritage Hub

# CCTV Policy

## 1. Policy statement and purpose

This policy explains how and why Gloucestershire Archives uses closed-circuit television (CCTV) at Gloucestershire Heritage Hub and outlines its responsibilities in doing so.

## 2. Scope

This policy applies to staff, volunteers, partners, contractors and visitors at Gloucestershire Heritage Hub. It covers the overt, fixed CCTV system operated on the site and all viewing, copying, export, disclosure, retention and deletion of its recordings. The system does not use audio recording, facial recognition or other automatic recognition technology and no covert surveillance is undertaken.

## 3. Background

Gloucestershire Archives gathers archive collections and local and family history resources to ensure they are kept secure and made accessible.

We are an accredited archive service recognised by The National Archives as the place of deposit for public records relating to Gloucestershire and South Gloucestershire.

We are a Gloucestershire County Council service. By agreement, we also provide an archive service for South Gloucestershire Council and are the appointed Record Office for the Diocese of Gloucester.

We are a lead partner in the Gloucestershire Heritage Hub, a network of local people and organisations with a common interest in our historic county's documented heritage.

## 4. Legal and governance framework

Gloucestershire Archives operates CCTV in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018, the Human Rights Act 1998, the Protection of Freedoms Act 2012, the Surveillance Camera Code of Practice and relevant Information Commissioner's Office guidance. The system is also managed consistently with

Gloucestershire County Council's CCTV and Surveillance Policy and the principles in South Gloucestershire Council's CCTV Code of Practice.

***Purpose, necessity and lawful basis***

CCTV is used to support the security of unique and irreplaceable archives, protect people and premises, deter and detect crime, and help prevent and investigate antisocial behaviour. Processing is undertaken in the public interest and in the exercise of Gloucestershire County Council's official authority. The purposes and lawful basis are recorded in our privacy notice, our CCTV Data Protection Impact Assessment (DPIA) and Gloucestershire County Council's Information Asset Register.

There are notices displayed prominently outside and inside the building informing customers, visitors and staff that CCTV is in operation.

## 5. Roles and responsibilities

The Head of Archives Service is the accountable officer and policy owner. The County Archivist is the designated deputy. Day-to-day system administration may be undertaken by the Buildings and Collections Security Officer and a named Archives Assistant.

- The accountable officer approves access, disclosures, changes to the system and the regular compliance review.
- System administrators oversee maintenance of the equipment, access records, fault logs, retention controls and the disclosure audit trail.
- Authorised users complete appropriate training, maintain confidentiality, follow this policy and report suspected misuse, faults and personal data breaches.

Unauthorised access, disclosure, copying or use may lead to disciplinary action and, where appropriate, legal action.

## 6. Access, security and system integrity

Access to live and recorded images is strictly limited to authorised staff with a business need in a secure staff area.

Recordings and exported footage are protected against unauthorised access, alteration, loss, copying or disclosure. Secure transfer methods and encryption are used where appropriate. The system is maintained so that camera coverage, image quality, date and

time settings, recording, storage and deletion controls remain accurate and effective. The Asset Management and Property Service is responsible for maintaining the system.

Any suspected personal data breach will be reported immediately through Gloucestershire County Council's information breach process so that it can be assessed and, where required, reported to the Information Commissioner's Office.

## 7. Disclosure and sharing

Recordings may be disclosed only where the request is lawful, necessary, proportionate and compatible with the purposes of the system, or where another legal obligation or exemption applies. Potential recipients may include the police, courts, legal representatives, insurers, regulatory bodies or authorised internal investigators.

Access requires a formal request, and information will be shared via an encrypted email package. We will retain a copy in our safe for the duration of the enquiry then delete it. We will maintain an audit trail of this process.

## 8. Retention and deletion

Routine CCTV recordings are automatically overwritten after 30 days.

Footage isolated for an incident, request, investigation or legal proceeding may be retained for longer only where necessary and if so, fully documented including the date of deletion.

## 9. Individual rights and complaints

Individuals may request access to personal data recorded about them by submitting a Subject Access Request to Gloucestershire County Council through the Council's information rights service.

Questions or complaints about the operation of CCTV may be sent to archives@gloucestershire.gov.uk. Complaints about the handling of personal data may also be raised through Gloucestershire County Council's data protection arrangements and, if unresolved, with the Information Commissioner's Office.

## 10. References and related documents

This policy should be read alongside Gloucestershire Archives' related policies at www.gloucestershire.gov.uk/archives/policies.

Please see also Gloucestershire County Council CCTV and Surveillance Policy

## 11. Monitoring, review and assurance

The CCTV system will be reviewed at least annually to confirm that its use remains lawful, justified, necessary, proportionate and effective.

This policy will be reviewed at least every three years and sooner if legislation, guidance, Council policy, processing purposes, technology or the CCTV system changes. Please write to archives@gloucestershire.gov.uk if you wish to give feedback on this policy.

### Document control

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| **Author** | Sally Middleton, former Community Heritage Development Manager |
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| **Approval body** | Gloucestershire Archives Management Team (GAMT); Gloucestershire County Council's Director of Policy, Performance & Governance; South Gloucestershire Archives Liaison Group |
| **Date Approved** | V1.1–1.2 July 2020 and June 2021; V1.3 October 2023; V1.4 draft October 2026, subject to approval |
| **Document Number** | V1.4 draft for consultation |

### Version history

| Version | Date | Summary of changes |
|---|---|---|
| 1.0 | Jul 2020 | Formal policy based on existing practices and procedures reviewed in June 2020 |
| 1.1 | Jun 2021 | Updated to include Gloucestershire County Council's CCTV and Surveillance Policy created in 2021 |
| 1.2 | Jun 2021 | Further updated to adjust the automatic retention period to 30 days rather than 90 days |
| 1.3 | Oct 2023 | Updated links to the ICO's latest guidance and removed reference to Egress Switch. Data Protection measures explicitly documented. Links updated. |
| 1.4 | Oct 2026 | Clearer scope; added UK GDPR lawful basis and wider legislative framework; aligned with Gloucestershire County Council's latest policy and South Gloucestershire Council's CCTV principles; updated links |

**Date of next scheduled policy revision:** 2029